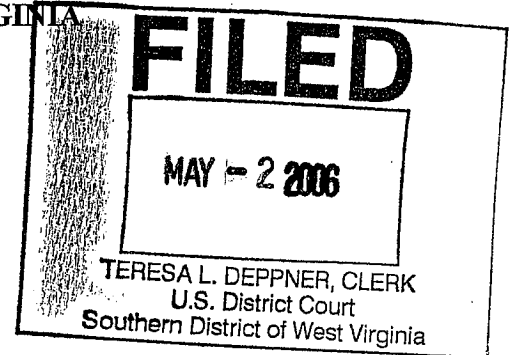


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WEST VIRGINIA
Charleston Division



KEEPER OF THE MOUNTAINS FOUNDATION)

Plaintiff,)

v.)

UNITED STATES DEPARTMENT OF JUSTICE,)

Defendant.)

2:06-0098
CA No 2:05-1135

PLAINTIFF'S MOTION FOR VAUGHN INDEX

Plaintiff respectfully requests that this Court enter an order compelling Defendant to produce an index of withheld documents, in compliance with *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974). In support of this motion, Plaintiff directs the Court's attention to the memorandum of points and authorities submitted herewith.

Respectfully submitted,

KEEPER OF THE MOUNTAINS FOUNDATION

By Counsel

A handwritten signature in dark ink, appearing to read "William V. DePaulo".

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CERTIFICATE OF SERVICE

I, hereby certify that a copy of the foregoing Motion was mailed, postage-prepaid, this

30 day of April, 2006, to the following:

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